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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 RICHARD KADREY, *et al.*,

12 Individual and Representative Plaintiffs,

13 v.

14 META PLATFORMS, INC., a Delaware
15 corporation

16 Defendant.

Case No. 3:23-cv-03417-VC

**STIPULATION AND [PROPOSED] ORDER
REGARDING CASE SCHEDULE**

Hon. Vince Chhabria

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18 Pursuant to N.D. Cal. Civil Local Rule 7-12, Plaintiffs Richard Kadrey, Sarah Silverman,
19 Christopher Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry
20 Hwang, Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher
21 Farnsworth (collectively, the “Plaintiffs”); and Defendant Meta Platforms, Inc. (“Meta”) (together, the
22 “Parties”), by and through their respective counsel, stipulate to the following:

23 1. On July 31, 2025, the Parties submitted a joint letter brief regarding outstanding discovery
24 disputes. ECF No. 615. The disputes raised by Plaintiffs concerned Meta’s productions in response to the
25 Court’s “baseball arbitration” discovery order. ECF Nos 470; 467; *see* 07/11/2025 Case Management
26 Conference Hr’g Tr. at 19:13-14 (“if there is a dispute about further discovery, it can go before Judge
27 Hixson”).
28

1 2. On August 1, 2025, Judge Hixson granted Plaintiffs' motion to compel compliance in part
2 and denied it in part. ECF No. 616. Pursuant to that Order, Meta produced additional responsive documents
3 on August 30.

4 3. On September 2, 2025, the Court issued an Order setting a Case Schedule for expert
5 discovery and summary judgment briefing for the remaining claims in this case. ECF No. 623 (the
6 "Scheduling Order").

7 4. In the process responding to questions from Plaintiffs, Meta discovered additional
8 responsive information (the "New Evidence"). Meta made Plaintiffs aware of this new evidence on
9 September 12, 2025, and it made a production that day. Meta made another production on September 17.
10 Meta continues to investigate and may make additional productions.

11 5. Plaintiffs assert that the New Evidence is relevant to Plaintiffs' expert analysis and report,
12 which is currently due on September 30, 2025. The Parties therefore respectfully seek to modify the
13 Scheduling Order to allow Meta to complete its investigation while also affording Plaintiffs' expert
14 sufficient time to analyze and incorporate the New Evidence into his report.

15 6. In light of this New Evidence, Plaintiffs contend that they are entitled to additional,
16 torrenting-focused fact and Rule 30(b)(6) depositions, and potentially written discovery, and the parties are
17 meeting and conferring regarding those issues.

18 7. In view of the additional time Plaintiffs request for their expert analysis and report related
19 to the New Evidence, and to allow sufficient time for any further discovery that may be warranted, and to
20 brief and resolve existing and potential disputes concerning the scope of any further discovery, the Parties
21 jointly propose an extension of approximately 50 days to the current expert report deadlines in the Schedule
22 Order, and approximately 60 days for the expert deposition and summary judgment briefing deadlines, as
23 follows:

Event	Current Scheduling Order (ECF Nos. 623 and 622)	Proposed Deadline
Plaintiffs' Expert Report	Tuesday, September 30, 2025	Friday, November 14, 2025
Meta Rebuttal to Plaintiffs' Expert Report	Thursday, October 30, 2025	Friday, December 12, 2025
Deadline to Complete Expert Depositions	Monday, November 10, 2025	Wednesday, December 31, 2025
Summary Judgment Brief 1	Friday, November 21, 2025	Friday, January 9, 2026
Summary Judgment Brief 2	Friday, December 19, 2025	Friday, February 6, 2026
Summary Judgment Brief 3	Thursday, January 15, 2026	Thursday, March 5, 2026
Summary Judgment Brief 4	Thursday, January 29, 2026	Thursday, March 19, 2026
Summary Judgment Hearing	Thursday, February 12, 2026	Thursday, April 2, 2026

Dated: September 23, 2025

Respectfully submitted,

By: /s/ Phillip Morton

By: /s/ Maxwell V. Pritt

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*Attorneys for Defendant
META PLATFORMS, INC.*

ECF ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Meta concurs in the filing of this document.

/s/ Maxwell V. Pritt
Maxwell V. Pritt

PROPOSED ORDER

Pursuant to the stipulation of the Parties, the Court grants the Parties' request to amend the Case Schedule.

IT IS SO ORDERED.

DATED: _____

HON. VINCE CHHABRIA
United States District Judge